

1 GAUNTLETT & ASSOCIATES
2 DAVID A. GAUNTLETT (Bar No. 96399)
3 JAMES A. LOWE (Bar No. 215383)
4 18400 Von Karman Avenue, Suite 300
5 Irvine, California 92612
6 Telephone: (949) 553-1010
7 Facsimile: (949) 553-2050
8 Email: jal@gauntlettlaw.com
9 ams@gauntlettlaw.com

10 Attorneys for Plaintiff
11 INFOR GLOBAL SOLUTIONS (MICHIGAN), INC.

12 SEDGWICK, DETERT, MORAN & ARNOLD LLP
13 GREGORY C. READ
14 BRUCE D. CELEBREZZE Bar No. 102181
15 One Market Plaza
16 Steuart Tower, 8th Floor
17 San Francisco, California 94105
18 Telephone: (415) 781-7900
19 Facsimile: (415) 781-2635
20 Email: gregory.read@sdma.com
21 bruce.celebrezze@sdma.com

22 Attorneys for Defendant
23 ST. PAUL FIRE AND MARINE INSURANCE COMPANY

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

26 INFOR GLOBAL SOLUTIONS
27 (MICHIGAN), INC., a Michigan
28 corporation,

Plaintiff,

v.

ST. PAUL FIRE & MARINE
INSURANCE COMPANY, a Minnesota
corporation,

Defendant.

CASE NO. C08 02621 JW

**STIPULATION AND XXXXXXXXXXXX ORDER
REGARDING DEPOSITION OF INFOR'S
30(B)(6) WITNESS**

SEDGWICK
DETERT, MORAN & ARNOLD LLP

1 RECITATIONS

2 On June 10, 2009, defendant St. Paul Fire and Marine Insurance Company moved
3 the court for an order permitting the continued deposition of Infor pursuant to Fed.R.Civ.P.
4 30(b)(6). [Document 146.] By order dated August 3, 2009 the court granted that motion and
5 permits such deposition to be taken. [Document 199.] On June 16, 2009, defendant St. Paul Fire
6 and Marine Insurance Company moved the court for an order permitting it to amend its answer to
7 plead the affirmative defense of unclean hands. [Document 162] By order dated July 10, 2009,
8 the court granted that motion and permitted discovery on the issue of unclean hands to be done
9 up through August 31, 2009. [Document 181]

10 Infor intends to produce the same witness, Gwen Nielsen, to respond to questions in
11 response to the deposition notice that was the subject of the August 3, 2009 order [Document
12 199], and to respond to questions concerning unclean hands as allowed by the July 10, 2009
13 order [Document 181].

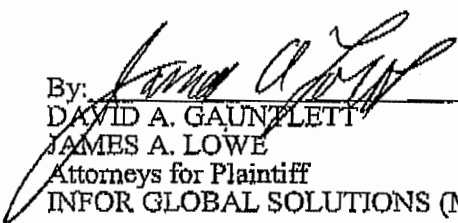
14 STIPULATION

15 Infor agrees that it will not object to a notice of deposition for September 17, 2009, on
16 grounds related to timeliness. For the convenience of the witness and of counsel, and to reduce
17 unnecessary litigation expense, the parties stipulate that Ms. Nielsen shall be produced for
18 deposition on September 17, 2009, in response to this court's orders of July 10, 2009, and of
19 August 3, 2009, and at that time shall respond to discovery and questions concerning defendant's
20 defense of unclean hands, notwithstanding the deadline previously set in the court's order of July
21 10, 2009.

22 IT IS SO STIPULATED.

23
24 DATED: August 11, 2009

GAUNTLETT & ASSOCIATES

25
26 By: 
27 DAVID A. GAUNTLETT
JAMES A. LOWE

28 Attorneys for Plaintiff
INFOR GLOBAL SOLUTIONS (MICHIGAN), INC.

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DATED: August 12, 2009

SEDGWICK, DETERT, MORAN & ARNOLD LLP

By: 

GREGORY C. READ

BRUCE D. CELEBREZZE

Attorneys for Defendant

ST. PAUL FIRE AND MARINE INSURANCE
COMPANY

PURSUANT TO STIPULATION IT IS SO ORDERED.

Dated: August 17, 2009



United States District Judge

Magistrate

SEDGWICK
DETERT, MORAN & ARNOLD LLP

SF/1618534v1

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STIPULATION REGARDING DEPOSITION

CASE NO. C08 02621 JW